

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JIHAD A. HACHEM, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

- v. -

GENERAL ELECTRIC, INC., JEFFREY R.
IMMELT, JEFFREY S. BORNSTEIN, and
JOHN L. FLANNERY,

Defendants.

No. 1:17-cv-08457-JMF

GOPAL MIRANI, Individually and On
Behalf of All Others Similarly Situated,

Plaintiff,

- v. -

GENERAL ELECTRIC COMPANY,
JEFFREY R. IMMELT, and JEFFREY S.
BORNSTEIN,

Defendants.

No. 1:17-cv-08473-JMF

TAMPA MARITIME ASSOCIATION
INTERNATIONAL LONGSHOREMEN'S
ASSOCIATION PENSION PLAN,
Individually and On Behalf of All Others
Similarly Situated,

Plaintiff,

- v. -

GENERAL ELECTRIC COMPANY,
JEFFREY R. IMMELT, JEFFREY S.
BORNSTEIN, JOHN L. FLANNERY, and
JAMIE MILLER,

Defendants.

No. 1:17-cv-09888-JMF

**SECOND DECLARATION OF JAVIER BLEICHMAR
IN SUPPORT OF THE CITY OF BOCA RATON POLICE AND FIREFIGHTERS'
RETIREMENT SYSTEM'S MOTION FOR APPOINTMENT AS LEAD PLAINTIFF
AND APPROVAL OF ITS SELECTION OF LEAD COUNSEL**

I, Javier Bleichmar, pursuant to 28 U.S.C. § 1746, declare as follows:

1. I am a partner of the law firm of Bleichmar Fonti & Auld LLP (“BFA”), counsel for the City of Boca Raton Police and Firefighters’ Retirement System (“Boca Raton”). I am a member in good standing of the bar of the State of New York and of this Court. I submit this declaration in support of Boca Raton’s Motion for Appointment as Lead Plaintiff and Approval of Its Selection of Lead Counsel.

2. Attached hereto as Exhibit A is a chart, prepared by BFA, listing Arkansas Teachers Retirement System’s Lead Plaintiff Appointments in the last three years.

3. Attached hereto as Exhibit B is a chart, prepared by BFA, listing Arkansas Teachers Retirement System’s Motions for Lead Plaintiff since 2010.

4. Attached hereto as Exhibit C is a true and correct copy of Defendants’ Notice of Authorities and Information With Respect to Pending Motions for Lead Plaintiff Appointment, filed in *Knurr v. Orbital ATK et al.*, 16-cv-1031-TSE-MSN, ECF No. 25, (E.D. Va. Oct. 27, 2016).

5. Attached hereto as Exhibit D is a true and correct copy of the Notice of Critical Status for Pension Trust Fund for Operating Engineers.

6. Attached hereto as Exhibit E is a true and correct copy of the Hearing Transcript, in *Schaffer v. Horizon Pharma PLC*, No. 16-cv-1763, (S.D.N.Y. June 3, 2016), ECF No. 62.

7. Attached hereto as Exhibit F is a chart, prepared by BFA, listing the lead plaintiff appointments since 2010 of the Pension Trust Fund for Operating Engineers.

8. Attached hereto as Exhibit G is a true and correct copy of the Docket in *Bray v. Frontier Communications Corp.*, No. 3:17-cv-01617 (D. Conn.) as of January 15, 2018.

I hereby declare under penalty of perjury that the foregoing is true and correct. Executed
this 15th day of January 2018.

/s/ Javier Bleichmar

Javier Bleichmar

CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2018, I authorized the electronic filing of the foregoing with the Clerk of the Court using the CM/ECF system which will send electronic notification of such filing to the registered participants.

/s/ Javier Bleichmar

Javier Bleichmar